City of Tulsa Ethics Hotline Statistics

Fiscal years 2015-2017

City of Tulsa Internal Auditing

June 2017

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Fiscal Years 2015-17

City of Tulsa Internal Auditing

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Introduction / Background

As part of a joint effort of the Mayor, City Council and City Auditor to develop the first code of ethics for the City (TRO, Title 12, Chapter 6, "the Ethics Ordinance"), City Auditor Phil Wood launched an ethics hotline ("the Hotline"). The Hotline provides a method for City employees, suppliers, citizens and other interested parties to anonymously report alleged or suspected fraud, waste, abuse, or other inappropriate incidents. Although the Hotline was implemented concurrently with the Ethics Ordinance; it is not referenced in the ordinance and is separate from the complaint process established in the ordinance.

This audit report is to inform readers of how the Hotline is administered and to provide summary statistics.

City of Tulsa Hotline Process and Administration

The Office of the City Auditor administers the Hotline using an independent, outside hotline service provider, NAVEX Global. Highlights of the services provided by NAVEX Global include:

- 24/7 call centers capable of receiving anonymous and/or named reports through toll free telephone number, email and the internet using a technology assisted interview process.

- Call-back capability allows the City to post questions to be asked callers by NAVEX Global staff. Callers are given a report identification number that allows them to check on the status of their complaint or add information to their report. The City uses the call-back capability when a caller chooses to remain anonymous or does not provide contact information.

- NAVEX Global provides incident reports and a web-based Case Management System. Incident reports are sent by email within one business day, usually within four hours.

- Escalation procedures are in place to send reports within 15 minutes for calls involving imminent threats of violence, harm to persons or loss of assets. A call-tree has been established and NAVEX Global makes immediate phone calls to the designated parties when an escalated report has been sent.

- Case managers have access to view and update case information on the Case Management System database.

Incident Report Distribution and Investigation

The Ethics Ordinance defines Appointing Authorities and specifies their responsibility for investigation and appropriate actions regarding reported ethics complaints filed with the City Clerk. Although the Hotline is separate from the Ethics Ordinance; Internal Auditing implemented procedures for transmitting Hotline incident reports to the Appointing Authorities following the framework established in the Ethics Ordinance, which is as follows.

- Reports on the Mayor are sent to City Auditor
- Reports on City Councilors are sent to City Council
- Reports on the City Auditor are sent to City Council
- Reports on employees (except Human Resources Department Director and staff, and City Council staff) are sent to the Mayor and Human Resources Director
- Although the Ethics Ordinance does not require this, reports on Human Resources Department Director and staff are sent to the Mayor and the Mayor's Chief of Staff. This variation was made so Human Resources Department does not receive or investigate complaints on their own staff.
- Reports on Trustees and Authority, Board and Commission members are sent to the Mayor or designee.

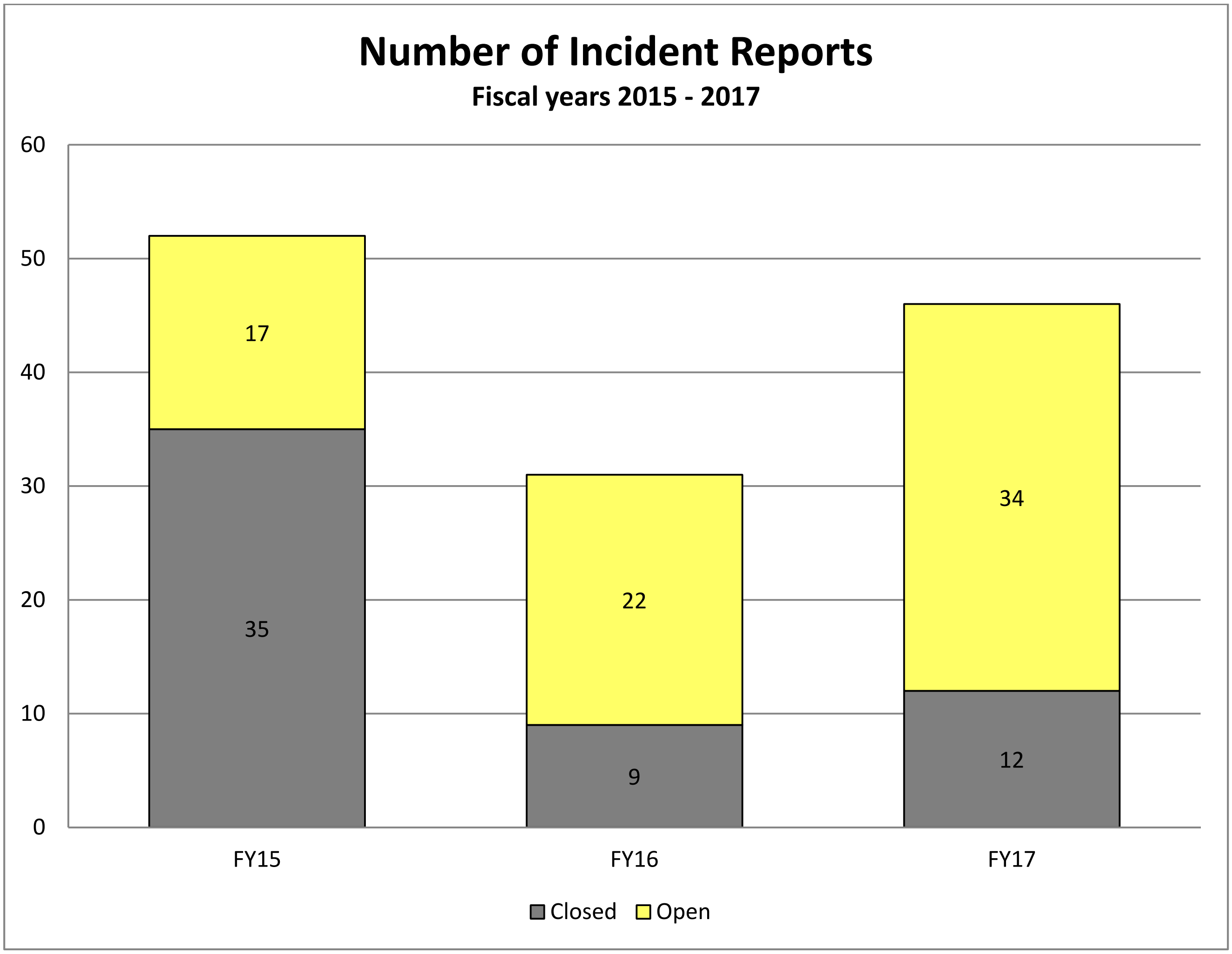
Appointing Authorities complete investigation of the complaint and/or other disposition. With the exception of City Council, Appointing Authorities report investigation results and resolution information to Internal Auditing for entry in the Case Management System. The City Council has adopted an internal operating procedure for investigating ethics complaints that does not include sending investigation and resolution information for entry into the case management system.

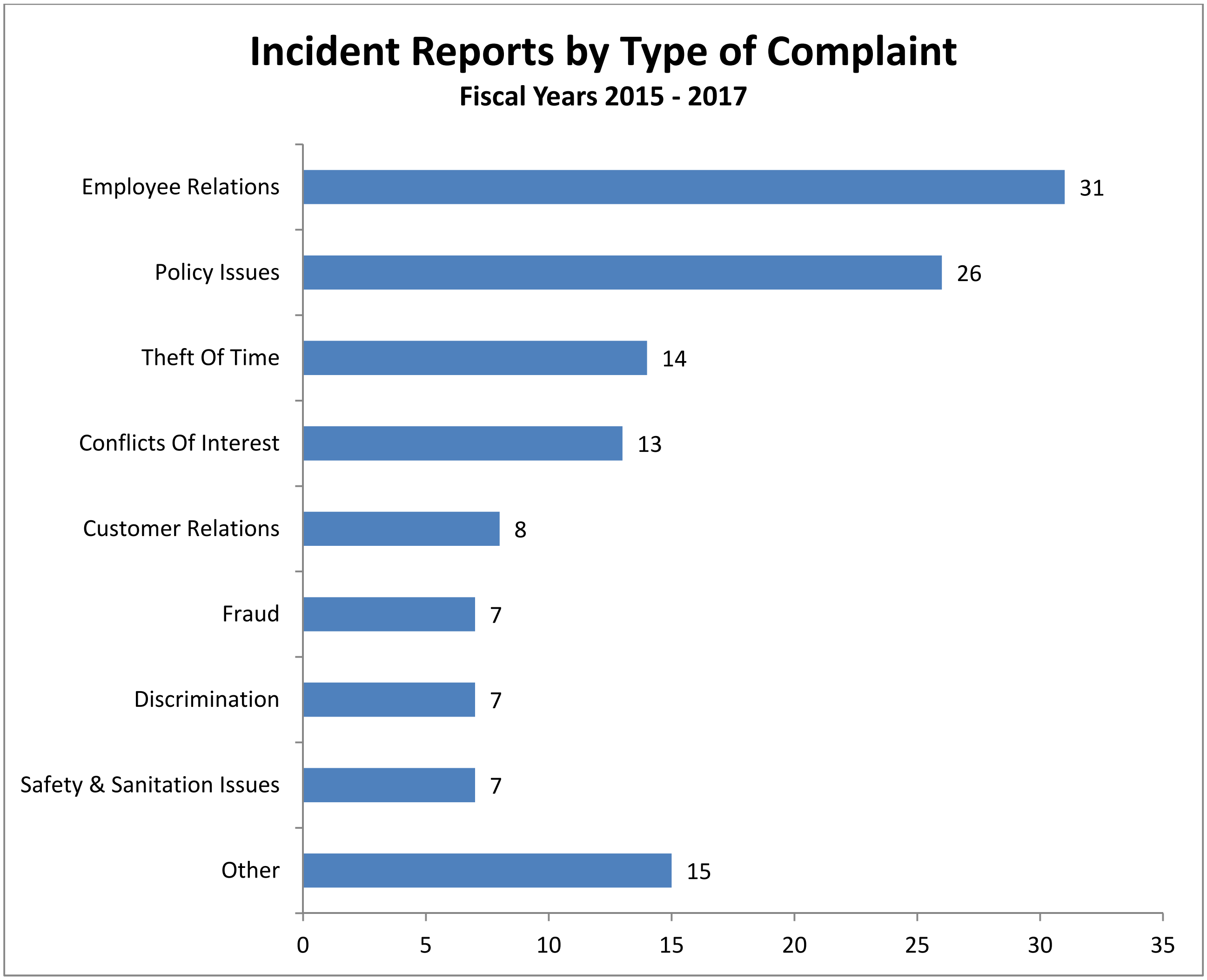
Case Life-Cycle Summary

The normal workflow of a case from beginning to end; includes the following steps:

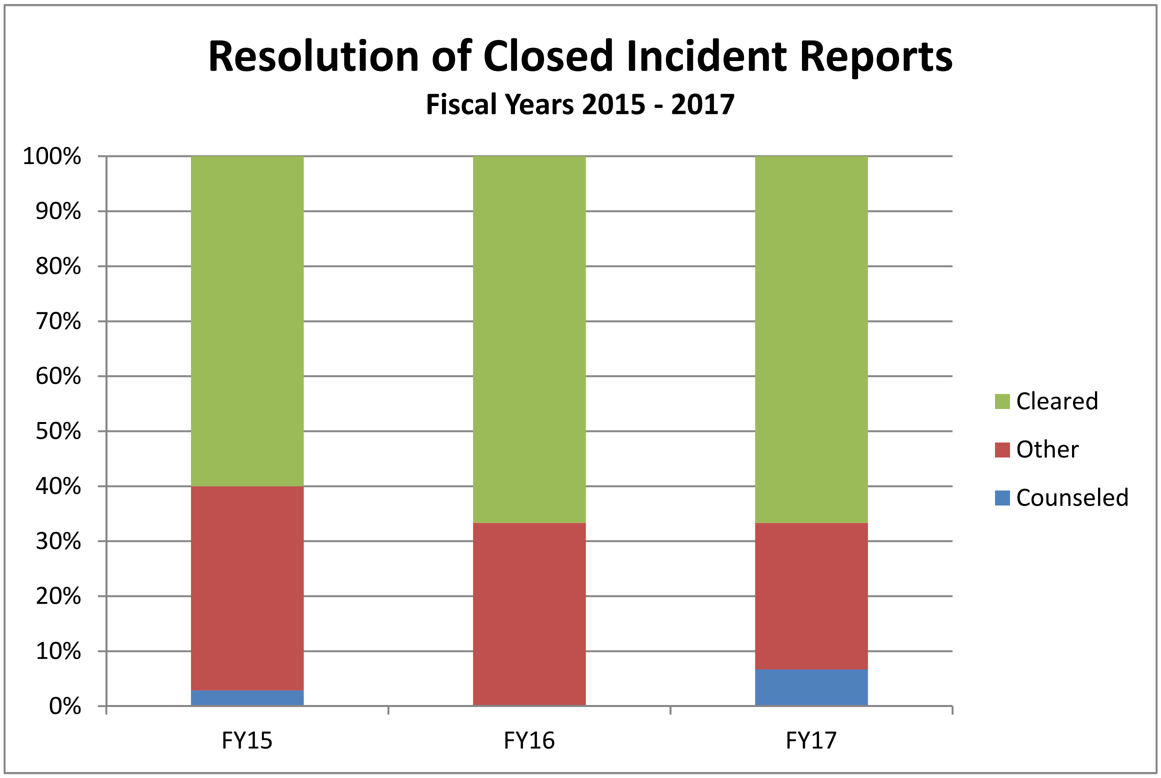
1. NAVEX Global emails the Incident Report to the Case Manager
2. The Case Manager assigns an Investigator
3. The Case Management System notifies the Investigator of the case assignment
4. The Investigator documents investigation and resolution activities in the Case Management System
5. The Investigator sends the case back to the Case Manager for approval/closure
6. The Case Management System notifies the Case Manager that a case is pending approval
7. The Case Manager reviews and closes the case in the Case Management System

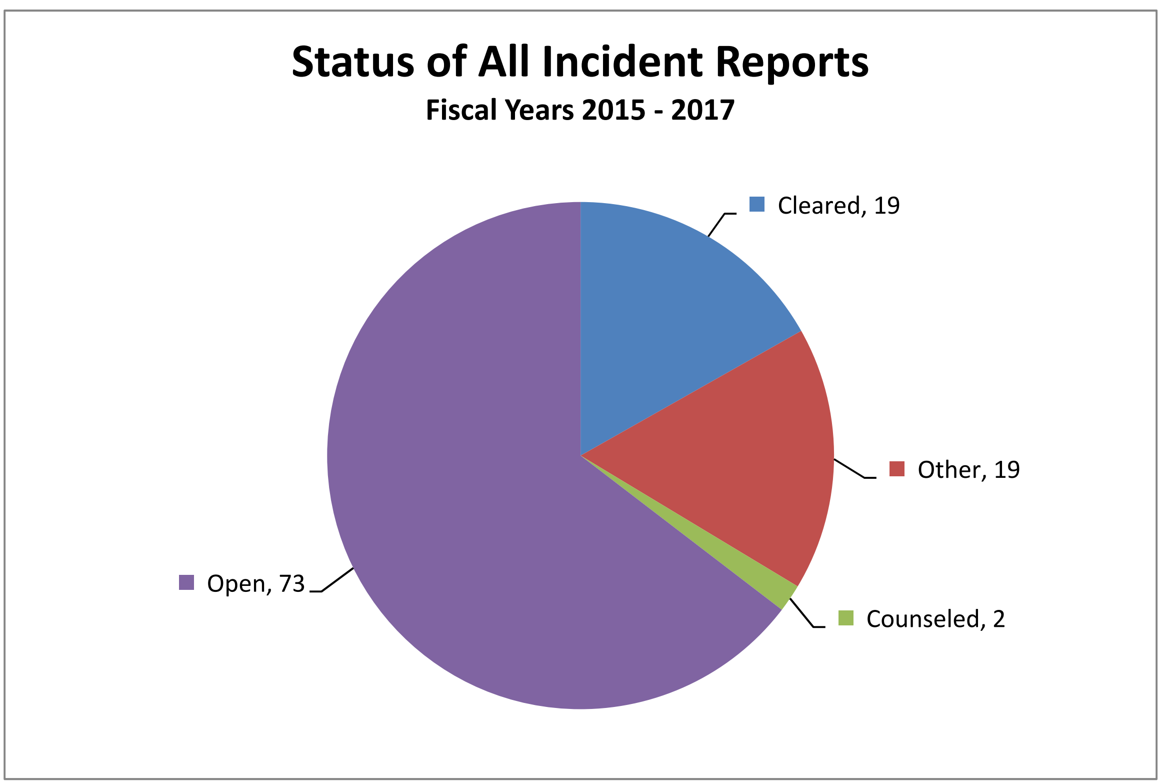
A flowchart of the current Hotline process and administration is presented at Exhibit 1.

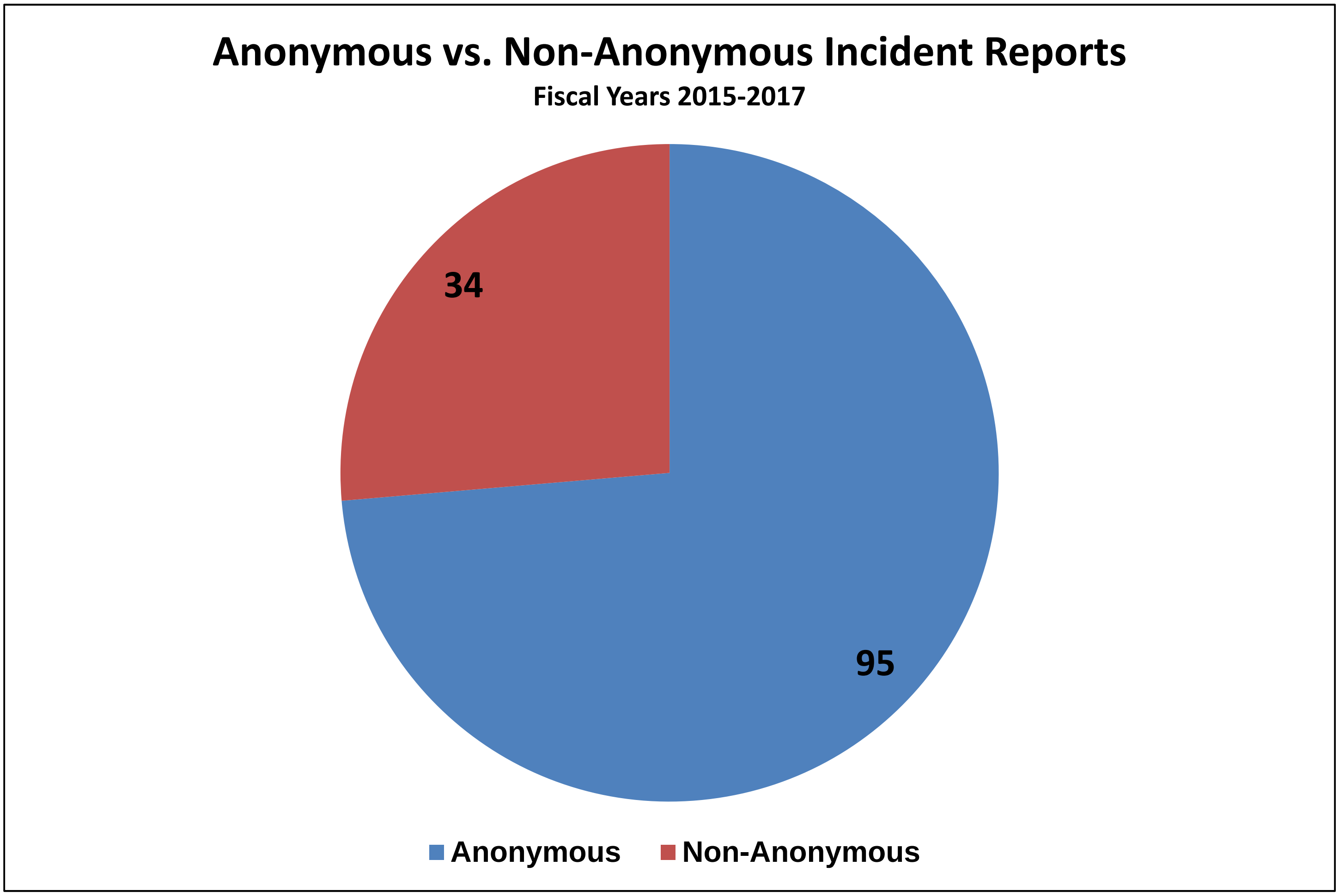

Number of Incident Reports
Fiscal years 2015 - 2017
60
50
40
30
20
10
0
17
35
22
9
34
12
FY15
FY16
FY17
Closed
Open

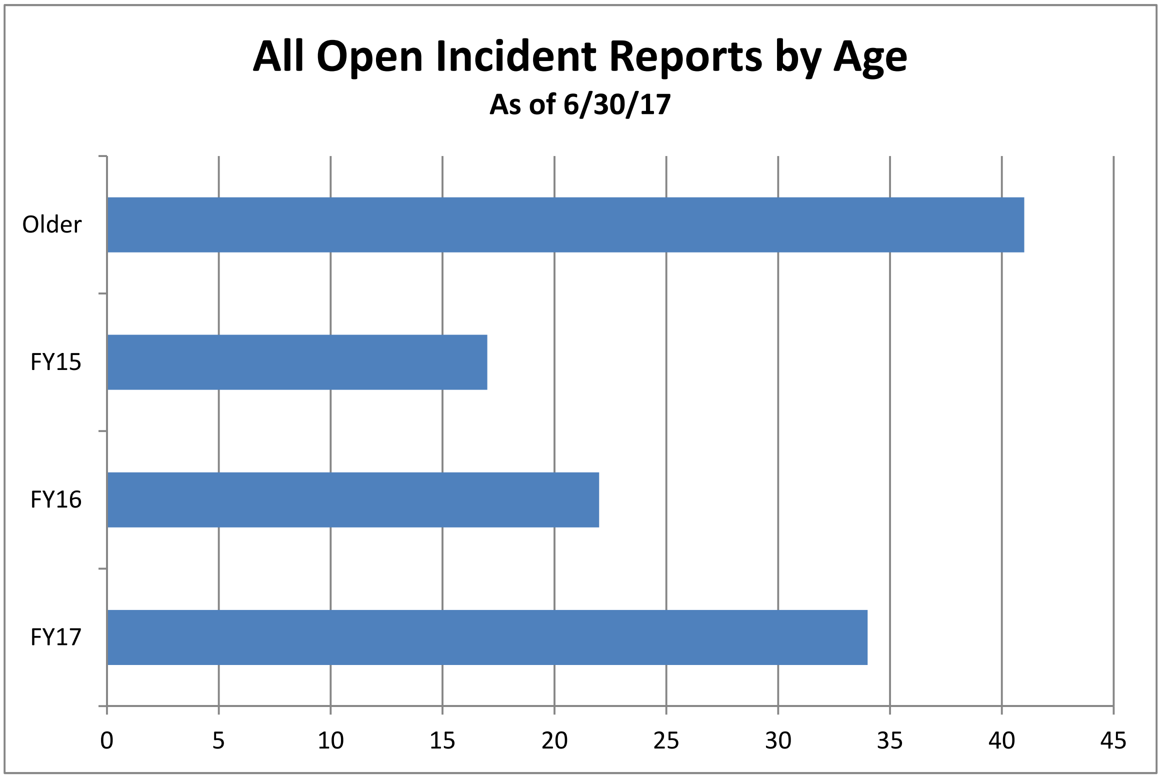


Note: The person making the complaint to the Hotline determines the Incident type. NAVEX assigns an incident code based on the primary issue reported by the caller.


Resolution of Closed Incident Reports
Fiscal Years 2015 - 2017
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
FY15
FY16
FY17
Cleared
Other
Counseled


Status of All Incident Reports
Fiscal Years 2015 - 2017
Cleared, 19
Other, 19
Counseled, 2
Open, 73


Anonymous vs. Non-Anonymous Incident Reports
Fiscal Years 2015-2017
34
95
Anonymous
Non-Anonymous



Incident Reports stay open in the Case Management System until Internal Auditing is notified by the Appointing Authority the investigation is complete.

Open Incident reports date from April 6, 2011 to June 28, 2017.

Older Incident Reports may have been investigated but notification from the Appointing Authorities was not received by Internal Auditing to close the Incident Report in the Case Management System. Internal Auditing periodically follows-up with the Appointing Authorities to determine if the investigations are complete and currently has work in process to complete closure of older Incident Reports remaining in the Case Management System.